

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

2 A Limited Liability Partnership

3 Including Professional Corporations

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12 Attorneys for BO1BO2 United Management,

13 LLC; Beach Orangethorpe, LLC; and Beach

14 Orangethorpe II, LLC

15 UNITED STATES BANKRUPTCY COURT

16 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

17 In re

18 THE SOURCE HOTEL, LLC, a California  
19 limited liability company,

20 Debtor and Debtor-in-  
21 Possession.

Case No.: 8:21-bk-10525-ES

Chapter 11

**NOTICE OF APPEARANCE AND  
REQUEST FOR SPECIAL NOTICE**

22 **PLEASE TAKE NOTICE THAT**, Sheppard, Mullin, Richter & Hampton LLP  
23 (“Sheppard Mullin”), as attorneys for Beach Orangethorpe, LLC, a California limited liability  
24 company (“BO1”), Beach Orangethorpe II, LLC, a California limited liability company (“BO2”),  
25 and BO1BO2 United Management LLC, a California limited liability company, (collectively, the  
26 “Source at Beach Secured Parties”), interest parties in the above-captioned bankruptcy case (the  
27 “Bankruptcy Case”), hereby enters its appearance pursuant to section 1109(b) of title 11 of the  
28 United States Code (the “Bankruptcy Code”), and Rule 9010(b) of the Federal Rules of  
Bankruptcy Procedure (the “Bankruptcy Rules”), and requests that the undersigned be added to the  
official mailing matrix, CM/ECF, and service lists in the Bankruptcy Case. Sheppard Mullin  
requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and section 1109(b) of the  
Bankruptcy Code, that copies of all notices and pleadings given or required to be given in the

1 Bankruptcy Case and copies of all papers served or required to be served in the Bankruptcy Case,  
2 including but not limited to, all notices, reports, pleadings, motions, applications, lists, schedules,  
3 statements, plans, disclosure statements and all other matters arising herein or in any related  
4 adversary proceeding, be given and served upon Sheppard Mullin at the following address:

5 Sheppard, Mullin, Richter & Hampton LLP  
6 Attn: Aaron J. Malo, Esq.  
650 Town Center Drive, 4<sup>th</sup> Floor  
7 Costa Mesa, California 92626  
Telephone: 714.513.5100  
8 Facsimile: 714.513.5130  
E mail [amalo@sheppardmullin.com](mailto:amalo@sheppardmullin.com)

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10 **PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the  
11 Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the  
12 Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any  
13 application, complaint or demand, motion, petition, pleading or request, and answering or reply  
14 papers filed in this case, whether formal or informal, written or oral, and whether served,  
15 transmitted or conveyed by mail, electronic mail, hand delivery, telephone, fax or otherwise filed  
16 or made with regard to the above-captioned case.

17 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim or  
18 suit is intended or shall be deemed to waive any (i) right(s) to have all core matters subject to  
19 Article III jurisdiction heard and decided by a district judge; (ii) right(s) to have final orders in  
20 non-core matters entered only after a de novo review by a district judge; (iii) right(s) to trial by  
21 jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto;  
22 (iv) right(s) to have the reference withdrawn by the United States District Court in any matter  
23 subject to mandatory or discretionary withdrawal; or (v) other rights, claims, actions, defenses,  
24 setoffs or recoupments to which the creditor may be entitled to under agreements, in law, or in  
25 equity.  
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1 Dated: September 17, 2021

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

2  
3 By

/s/ Kyle J. Mathews

AARON J. MALO

KYLE J. MATHEWS

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5 Attorneys for BO1BO2 United Management, LLC;  
6 Beach Orangethorpe, LLC; and Beach Orangethorpe II,  
7 LLC  
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